

From: Thompson, Lisa
Sent: Monday, February 12, 2018 03:48 PM
To: North, Alexis; Mia, Marcia
Subject: RE: Shut-in well question

I only asked about delay of repair

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

From: North, Alexis
Sent: Monday, February 12, 2018 10:37 AM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: Shut-in well question

Karen Marsh called and asked if I had "any guidance on shut-in facilities". She didn't mention delay of repair or anything else. That isn't very helpful, I know.

I'm answering it as if a company fracked a well, it started producing and then shut in the well in before it's due for either the initial survey or subsequent semiannual surveys per 60.5397a.

Does that help??

Alexis North, Environmental Scientist

Office of Enforcement, Compliance & Environmental Justice

EPA Region 8

1595 Wynkoop Street (8ENF-AT)

Denver, CO 80202-1129

Phone: 303-312-7005

Email: north.alexis@epa.gov

From: Thompson, Lisa
Sent: Monday, February 12, 2018 8:26 AM
To: North, Alexis <North.Alexis@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: Shut-in well question

Can you provide a bit more context?

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

From: North, Alexis

Sent: Monday, February 12, 2018 10:23 AM

To: Thompson, Lisa <Thompson.Lisa@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Subject: FW: Shut-in well question

Karen Marsh is asking me about how we might handle a "shut-in" well with LDAR applicability, see my answer to her below.

Please make sure I'm not going totally rogue here.

Thanks,

Alex

Hi Karen,

Ex. 5 Deliberative Process (DP)

60.4244 (b) You may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in §60.8(c). If your stationary SI internal combustion engine is non-operational, you do not need to startup the engine solely to conduct a performance test; however, you must conduct the performance test immediately upon startup of the engine.

Ex. 5 Deliberative Process (DP)

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Thanks and I'll follow up next week,

Alex

Alexis North, Environmental Scientist

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